

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**DIGBY ADLER GROUP LLC d/b/a  
BANDAGO**, a California limited liability  
Company,

Plaintiff,

vs.

**IMAGE RENT A CAR, INC., a New  
York Corporation, and VAN RENTAL  
CO., INC., a NEW YORK  
corporation,**

Defendants.

Case No. 3:10-cv-00617-SC

**DECLARATION OF CHANIE  
VILENKIN IN FURTHER SUPPORT  
OF DEFENDANTS' MOTION**

I Chanie Vilenkin submit this declaration in further support of Defendants' "Motion to Dismiss the Complaint or Alternatively to Transfer Venue to the Eastern District of New York."

I Chanie Vilenkin am the Office Manager of Image Rent A Car, Inc., ("Image") and have been an employee of Image since its inception in October of 2004.

As the office manager of Image I am familiar with the books business accounts. I know that Image only has offices in the States of New York and Florida. Image delivers rentals to Connecticut, Pennsylvania, Maryland, Washington D.C., and Virginia. Image has never conducted business in the state of California or delivered vehicles to the state of California. Image has never entered into a contract with any entity in the State of California. Image has no presence, office, employees, phone line, bank account or mailing address, in the State of California. I have never paid any bills or invoices to any California entities.

Moreover, I am a resident of Brooklyn, New York. I am not a party to the within action and I would testify at trial regarding the foregoing. Additionally, I would testify to the fact that from 2000 until 2004 I was an employee of Adir Rent A Car Inc. ("Adir") the prior owner of the trademark Bandago that Adir subsequently, assigned the trademark. Moreover, I will testify that

1  
2 Adir had utilized the trademark Bandago.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
4 June 2, 2010.

5 Dated: Brooklyn, NY  
6 June 2, 2010

7 /s/ Chanie Vilenkin  
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